

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN  
DISASTER SITE LITIGATION

**21 MC102 (AKH)**  
NOTICE TO PRODUCE DOCUMENTS  
PURSUANT TO FEDERAL RULE OF  
CIVIL PROCEDURE 34

To: McClier  
c/o Richard E. Leff, Esq.  
McGivney & Kluger, P.C.  
80 Broad Street, 23rd Floor  
New York, New York 10004  
(212) 509-3456  
[rleff@mklaw.us.com](mailto:rleff@mklaw.us.com)

**PLEASE TAKE NOTICE**, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 200 Vesey Street, 3WFC, as referenced in the deposition of John J. Ekholm, on December 13, 2012, at or about page as referenced below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merril Lextranet.

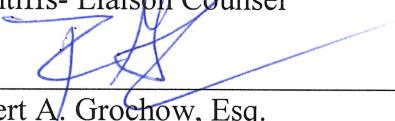
1. Mr. Ekholm's curriculum vitae or CV, as referenced on or about page 31 in the above referenced deposition.
  
2. Work authorization forms, or bates numbers of such forms, as referenced on or about page 94 in the above referenced deposition.

3. Contact information including residential address and current employer, to the extent available, for McClier employees or former employees, including but not limited to: Chris Martersteck, Scott Bini, Greg Gutierrez, John Kouchoukos, Jim Kronenwetter, Rick Popisil and Chris Sexton, as referenced on or about page 262 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation.

Dated: New York, New York  
February 27, 2013

GREGORY J. CANNATA & ASSOCIATES  
Plaintiffs- Liaison Counsel

By: 

Robert A. Grochow, Esq.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279-0003  
(212) 553-9205